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Attorneys for Defendant CITY OF VALLEJO

**UNITED STATES DISTRICT COURT**

**EASTERN DISTRICT OF CALIFORNIA, SACRAMENTO DIVISION**

NEFTALI MONTERROSA, individually and  
as co-successor-in-interest to Decedent SEAN  
MONTERROSA; NORA MONTERROSA,  
individually and as co-successor-in-interest to  
Decedent SEAN MONTERROSA;  
MICHELLE MONTERROSA, individually;  
ASHLEY MONTERROSA, individually,

Plaintiffs,

vs.

CITY OF VALLEJO, a municipal  
corporation; JARRETT TONN, individually,  
and, Vallejo police officers DOES 1-25,  
inclusive,

Defendants.

**Case No: 2:20-cv-01563-TLN-DB**

**NOTICE OF MOTION AND MOTION  
TO QUASH SUBPOENAS**

Date: June 3, 2022

Time: 10:00 a.m.

Crtrm: 27

Hon. Deborah Barnes

**TO: ALL PARTIES IN THIS ACTION AND THEIR COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on June 3, 2022 at 10:00 a.m. in Courtroom 27 of the  
above Court, the City of Vallejo will move to quash three subpoenas issued by Plaintiffs to  
Critical Incident Videos, Cole Pro Media, and R Giordano Consulting & Investigations, LLC.

1 The Motion is made pursuant to Federal Rule of Civil Procedure 45 on the grounds that the  
2 subpoenas seeks disclosure of privileged matter.  
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4 DATED: May 26, 2022

Respectfully submitted,

6 /s/ Katelyn M. Knight  
7 KATELYN M. KNIGHT  
8 Assistant City Attorney  
9 Attorney for Defendants CITY OF VALLEJO  
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